

**MEMO ENDORSED**

December 1, 2020

**Via ECF**

The Honorable Katherine Polk Failla,  
United States District Judge,  
United States District Court for the Southern District of New York,  
40 Foley Square,  
New York, New York 10007.

Re: *Arkansas Teacher Retirement System v. Allianz Global Investors US LLC et al*, No. 20-cv-05615;  
*Retirement Program for Employees of the Town of Fairfield et al v. Allianz Global Investors U.S. LLC*, No. 20-cv-05817;  
*Lehigh University v. Allianz Global Investors U.S. LLC et al*, No. 20-cv-07061;  
*Teamster Members Retirement Plan v. Allianz Global Investors U.S. LLC et al*, No. 20-cv-07154;  
*Blue Cross Blue Shield Association National Employee Benefits Committee v. Allianz Global Investors U.S. LLC et al*, No. 20-cv-07606;  
*Metropolitan Transportation Authority Defined Benefit Pension Plan Master Trust et al v. Allianz Global Investors U.S. LLC et al*, No. 20-cv-07842;  
*Chicago Area I.B. of T. Pension Plan & Trust et al v. Allianz Global Investors U.S. LLC et al*, No. 20-cv-07952;  
*The Employes' Retirement System of the City of Milwaukee v. Allianz Global Investors U.S. LLC et al*, No. 20-cv-08642;  
*The Chicago & Vicinity Laborers' District Council Pension Fund et al. v. Allianz Global Investors U.S. LLC et al*, No. 20-cv-09478;  
*The Boards Of Trustees For The Carpenters Health And Security Trust Of Western Washington et al v. Allianz Global Investors U.S. LLC et al*, No. 20-cv-09479; and  
*Paul Schaefer et al v. Allianz Global Investors U.S. LLC et al*, No. 20-cv-09587.

Dear Judge Failla:

Following the November 17, 2020 conference, and as directed in the Minute Entry on November 25, 2020, the parties in the above-captioned actions have been meeting and conferring in good faith and have made progress towards agreeing on many aspects of a joint report and case management submission. The parties request an additional two days to continue their discussions in the hopes of eliminating, or at least continuing to narrow, any areas of

disagreement so as not to burden the Court with disputes that the parties may be able to resolve through further conferrals. Accordingly, the parties respectfully request a two-day extension of time from December 1, 2020 until December 3, 2020 to submit the joint report on the proposed framework. No prior requests for an extension have been made.

Respectfully submitted,

/s/ Hannah Ross

Hannah Ross  
Avi Josefson  
James Harrod  
Michael Blatchley  
BERNSTEIN LITOWITZ BERGER  
AND GROSSMANN LLP  
1251 Avenue of the Americas  
New York, NY 10020  
Telephone: (212) 554-1400  
Facsimile: (212) 554-1444

*Co-Counsel for Plaintiff Arkansas Teacher Retirement System*

*Counsel for Plaintiff Employees' Retirement System of the City of Milwaukee; Chicago & Vicinity Laborers' District Council Pension Fund and the Chicago & Vicinity Laborers' District Council Health & Welfare Fund, and Catherine Wenskus, Administrator; The Boards of Trustees for the Carpenters Health and Security Trust of Western Washington and for the Group Investment Trust of the Carpenters Individual Account Pension Trust of Western Washington and Carpenters Retirement Trust of Western Washington*

/s/ Fredric S. Fox

Fredric S. Fox  
Donald R. Hall  
Melinda Campbell  
Aaron Schwartz  
KAPLAN FOX & KILSHEIMER LLP  
850 Third Avenue, 14th Floor  
New York, NY 10022  
Telephone: (212) 687-1980  
Facsimile: (212) 687-7714

/s/ Robert J. Giuffra, Jr.

Robert J. Giuffra, Jr.  
Stephanie G. Wheeler  
Kathleen Suzanne McArthur  
Ann-Elizabeth Ostrager  
Hilary M. Williams  
SULLIVAN & CROMWELL LLP  
125 Broad Street  
New York, New York 10004-2468  
Telephone: (212) 558-4000  
Facsimile: (212) 558-3588

*Counsel for Defendants*

/s/ Robert A. Skinner

Robert A. Skinner  
Amy D. Roy  
Mary Elizabeth Brust  
Cole A. Goodman  
ROPES & GRAY LLP  
Prudential Tower  
800 Boylston  
Boston, MA 02199  
Telephone: (617) 951-7000  
Facsimile: (617) 951-7050

*Co-Counsel for Defendant Allianz Global Investors U.S. LLC*

*Co-Counsel for Plaintiff Arkansas Teacher Retirement System*

*Co-Counsel for Plaintiffs Chicago Area I.B of T. Pension Plan & Trust and Local 703 I.B. of T., Grocery and Food Employees' Pension Plan & Trust*

/s/ David S. Golub

David S. Golub  
Steven L. Bloch  
Ian W. Sloss  
SILVER GOLUB & TEITELL LLP  
184 Atlantic Street  
Stamford, CT 06901  
Telephone: (203) 325-4491  
Facsimile: (203) 325-3769

*Counsel for Plaintiffs Retirement Program for Employees of the Town of Fairfield and Retirement Program for Fairfield Police and Firemen's Retirement System*

/s/ Renita Sharma

Renita Sharma  
Richard Irving Werder, Jr.  
Andrew Peter Marks  
Michael Ethan Liftik  
QUINN EMANUEL URQUHART & SULLIVAN LLP  
51 Madison Avenue  
22nd Floor  
New York, NY 10010  
Telephone: (212) 849-7413  
Facsimile: (212)-849-7100

*Counsel for Defendant Aon Investments USA Inc. f/k/a Aon Hewitt Investment Consulting, Inc.*

/s/ Jonathan L. Hochman

Jonathan L. Hochman  
Matthew A. Katz  
Jenny C. Gu  
SCHINDLER COHEN & HOCHMAN LLP  
100 Wall Street, 15th Floor  
New York, NY 10005  
Telephone: (212) 277-6300  
Facsimile: (212) 277-6333

*Counsel for Plaintiff Lehigh University*

/s/ William C. Fredericks

William C. Fredericks  
(wfredericks@scott-scott.com)  
Donald A. Broggi (dbroggi@scott-scott.com)  
Zachary M. Vaughan  
(zvaughan@scott-scott.com)

SCOTT + SCOTT ATTORNEYS AT LAW  
LLP  
The Helmsley Building  
230 Park Avenue, 17th Floor  
New York, NY 10169  
Telephone: (212) 223-6444  
Facsimile: (212) 223-6334

*Counsel for Plaintiff Teamster Members  
Retirement Plan f/k/a GCIU Inter-Local  
Pension Plan and Bricklayers and Masons'  
Local Union No. 5, Ohio Pension Fund*

/s/ Daniel Z. Goldman  
Daniel Z. Goldman (dgoldman@pkblp.com)  
PETRILLO KLEIN & BOXER LLP  
655 Third Avenue, 22nd Floor  
New York, NY 10017  
Telephone: (212) 370-0330

/s/ Sean W. Gallagher  
Sean W. Gallagher  
Adam L. Hoeflich  
Mark S. Ouweleen  
Abby M. Mollen  
Nicolas L. Martinez  
BARTLIT BECK LLP  
54 West Hubbard Street, Suite 300  
Chicago, IL 60654  
Telephone: (312) 494-4400

*Counsel for Plaintiff Blue Cross and Blue  
Shield Association National Employee  
Benefits Committee*

/s/ Javier Bleichmar  
Javier Bleichmar  
George N. Bauer  
BLEICHMAR FONTI & AULD LLP  
7 Times Square, 27th Floor  
New York, New York 10036  
Telephone: (212) 789-1340  
Facsimile: (212) 205-3960

/s/ Regina Calcaterra

Regina Calcaterra  
Justin Teres  
CALCATERRA POLLACK LLP  
1140 Avenue of the Americas, 9th Floor  
New York, New York 10036  
Telephone: (212) 899-1760

*Counsel for Plaintiffs Metropolitan  
Transportation Authority Defined Benefit  
Pension Plan Master Trust, Manhattan and  
Bronx Surface Transit Operating Authority  
Pension Plan, and Metropolitan  
Transportation Authority Other  
Postemployment Benefit Plan*

/s/ Scott F. Hessell

Scott F. Hessell  
John Bjork  
Ashima Talwar  
Sperling & Slater, P.C.  
55 West Monroe Street, Suite 3200  
Chicago, Illinois 60603  
Telephone: (312) 641-3200

*Co-Counsel for Plaintiffs Chicago Area I.B of  
T. Pension Plan & Trust and Local 703 I.B. of  
T., Grocery and Food Employees' Pension  
Plan & Trust*

/s/ Justin S. Brooks

Justin S. Brooks  
GUTTMAN, BUSCHNER & BROOKS  
PLLC  
119 Coulter Ave., Suite 211  
Ardmore, PA 19003  
Telephone: (610) 827-0041

/s/ Elizabeth H. Shofner

GUTTMAN, BUSCHNER & BROOKS  
PLLC  
41-30 46<sup>th</sup> Street, Apt 1-0  
Ardmore, PA 19003

Telephone: (202)-800-3001

/s/ Reuben A. Guttman

Reuben A. Guttman  
GUTTMAN, BUSCHNER & BROOKS  
PLLC  
2000 P Street, N.W., Suite 300  
Washington, DC 20036  
Telephone: (202)-800-3001

/s/ Jonathan D. Karmel

Jonathan D. Karmel  
KARMEL LAW FIRM  
221 N. La Salle Street, Suite 1550  
Chicago, IL 60601  
Telephone: (800)-459-6264

/s/ Kenneth A. Wexler

Kenneth A. Wexler  
Mark J. Tamblyn  
WEXLER WALLACE LLP  
55 W. Monroe Street, Suite 3300  
Chicago, IL 60603  
Telephone: (312)-346-2222

*Co-Counsel for Plaintiffs Paul Schaefer and  
Robert O'Toole; Marc Parker; Brian Jordan;  
Mark Jacobs; and William R. Seehafer, as  
trustees of the United Food & Commercial  
Workers Unions & Employers Midwest  
Pension Fund*

cc: Counsel of Record (by ECF)

Application GRANTED. The Clerk of Court is directed to docket this Order in case numbers 20-cv-5615, 20-cv-5817, 20-cv-7061, 20-cv-7154, 20-cv-7606, 20-cv-7842, 20-cv-7952, 20-cv-8642, 20-cv-9478, 20-cv-9479, and 20-cv-9587.

Dated: December 1, 2020  
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE